

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

MICHAEL TOUSSAINT

No. 20-MJ-2431-MBB

**JOINT MOTION TO CONTINUE PRELIMINARY HEARING**

The United States and defendant Michael Toussaint jointly move the Court to continue the preliminary hearing in this matter, currently scheduled for Wednesday, July 8, 2020, at 10:00 a.m., to a date convenient to the Court in August, 2020. As reasons therefor, the parties state that the government produced extensive discovery in anticipation of the hearing, which the parties continue to review.

Respectfully submitted,

MICHAEL TOUSSAINT

ANDREW E. LELLING  
United States Attorney

By: /s/ Peter Horstmann  
PETER HORSTMANN  
Counsel for Michael Toussaint

By: /s/ Timothy E. Moran  
TIMOTHY E. MORAN  
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Assistant United States Attorneys  
District of Massachusetts

Date: July 6, 2020